

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**DECLARATION OF RYAN M.
BLAIR IN SUPPORT OF
DEFENDANTS' MEMORANDUM
OF LAW IN OPPOSITION TO
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION AND
APPOINTMENT OF CLASS
REPRESENTATIVES AND CLASS
COUNSEL**

I, Ryan M. Blair, hereby declare as follows:

1. My name is Ryan Blair and I am a Partner with the law firm of Cooley LLP. I am a member in good standing of the bar of California.
2. I serve as counsel to Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey in this matter.
3. I respectfully submit this declaration pursuant to 28 U.S.C. § 1746 in order to transmit to the Court certain documents referenced in Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel filed concurrently herewith.
4. I have personal knowledge of the facts set forth in this Declaration.
5. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Bruce Deal dated March 23, 2020.

6. Attached as **Exhibit 2** is a true and correct copy of excerpts of the transcript from the February 25, 2020 deposition of Michael L. Hartzmark.

7. Attached as **Exhibit 3** is a true and correct copy of Plaintiffs' Responses and Objections to Defendants' Second Set of Interrogatories dated March 4, 2020.

8. Attached as **Exhibit 4** is a true and correct copy of a press release issued by the State of Oregon Department of Justice dated December 31, 2019.

9. Attached as **Exhibit 5** is a true and correct copy of a document produced by Defendant CenturyLink, Inc. and bearing Bates number CTLMNSEC00500894. This document was designated "Highly Confidential – Attorneys' Eyes Only" under the October 19, 2019 Protective Order entered in this action and has been filed with the Court under seal.

10. Attached as **Exhibit 6** is a true and correct copy of excerpts of the transcript from the March 5, 2020 30(b)(6) deposition of the State of Oregon.

11. Attached as **Exhibit 7** is a true and correct copy of a spreadsheet produced by Plaintiffs in native format and bearing Bates number PL_0005123. This document was designated "Confidential" under the October 19, 2019 Protective Order entered in this action and has been filed with the Court under seal.

12. Attached as **Exhibit 8** is a true and correct copy of excerpts of the transcript from the March 3, 2020 deposition of Named Plaintiff Fernando Alberto Vildosola.

13. Attached as **Exhibit 9** is a true and correct copy of a *Bloomberg* article dated June 16, 2017 produced by Plaintiffs and bearing Bates number PL_0003503.

14. Attached as **Exhibit 10** is a true and correct copy of a *Bloomberg* article dated June 19, 2017 produced by Plaintiffs and bearing Bates number PL_0003511.

15. Attached as **Exhibit 11** is a true and correct copy of a *Bloomberg* article dated July 12, 2017 produced by Plaintiffs and bearing Bates number PL_0542835.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of March, 2020, in San Diego, CA.

/s/ Ryan Blair

Ryan M. Blair

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